

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

COMMANDER EMILY SHILLING; *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; *et al.*,

*Defendants.*

No. 2:25-cv-00241 BHS

**SECOND SUPPLEMENTAL  
DECLARATION OF MATTHEW P.  
GORDON IN SUPPORT OF  
PLAINTIFFS' REPLY IN  
SUPPORT OF MOTION FOR  
PRELIMINARY INJUNCTION**

I, Matthew P. Gordon, hereby declare as follows:

1. I am an attorney with the law firm Perkins Coie LLP and counsel for Plaintiffs in the above-captioned matter. I make this declaration based on personal knowledge about which I am competent to testify.

2. I submit this second supplemental declaration to provide the Court true and correct copies of certain documents submitted in support of Plaintiffs' Motion for Preliminary Injunction.

3. Attached as **Exhibit 27** is a true and correct copy Executive Order 14148, with the title "Initial Rescissions of Harmful Executive Orders and Actions," dated January 20, 2025, retrieved from the Federal Register website at: <https://www.govinfo.gov/content/pkg/FR-2025-01-28/pdf/2025-01901.pdf>.

SECOND SUPPL.  
DECLARATION OF  
MATTHEW P. GORDON ISO  
MOT. FOR PRELIMN. INJ. - 1  
(CASE NO. 2:25-CV-241 BHS)

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
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**Lambda Legal Defense and  
Education Fund, Inc.**  
120 Wall Street, 19th Floor  
New York, NY. 10005-3919  
Telephone: 212-809-8585

**Human Rights  
Campaign Foundation**  
1640 Rhode Island  
Avenue NW  
Washington, D.C. 20036

4. Attached as **Exhibit 28** is a true and correct copy Executive Order 14170, with the title “Reforming the Federal Hiring Process and Restoring Merit to Government Service,” dated January 20, 2025, retrieved from the Federal Register website at:

<https://www.govinfo.gov/content/pkg/FR-2025-01-30/pdf/2025-02094.pdf>.

5. Attached as **Exhibit 29** is a true and correct copy Executive Order 14187, with the title “Protecting Children From Chemical and Surgical Mutilation,” dated January 28, 2025, retrieved from the Federal Register website at: [https://www.govinfo.gov/content/pkg/FR-2025-](https://www.govinfo.gov/content/pkg/FR-2025-02-03/pdf/2025-02194.pdf)

[02-03/pdf/2025-02194.pdf](https://www.govinfo.gov/content/pkg/FR-2025-02-03/pdf/2025-02194.pdf).

6. Attached as **Exhibit 30** is a true and correct copy Executive Order 14190, with the title “Ending Radical Indoctrination in K-12 Schooling,” dated January 29, 2025, retrieved from the Federal Register website at: [https://www.govinfo.gov/content/pkg/FR-2025-02-](https://www.govinfo.gov/content/pkg/FR-2025-02-03/pdf/2025-02232.pdf)

[03/pdf/2025-02232.pdf](https://www.govinfo.gov/content/pkg/FR-2025-02-03/pdf/2025-02232.pdf).

7. Attached as **Exhibit 31** is a true and correct copy Executive Order 14201, with the title “Keeping Men Out of Women’s Sports,” dated February 5, 2025, retrieved from the Federal Register website at: [https://www.govinfo.gov/content/pkg/FR-2025-02-11/pdf/2025-](https://www.govinfo.gov/content/pkg/FR-2025-02-11/pdf/2025-02513.pdf)

[02513.pdf](https://www.govinfo.gov/content/pkg/FR-2025-02-11/pdf/2025-02513.pdf).

8. Attached as **Exhibit 32** is a true and correct copy of the Palm Center’s report titled “DoD’s Rationale for Reinstating the Transgender Ban Is Contradicted by Evidence,” dated April 2018 (updated May 4, 2018), retrieved from: [https://www.palmcenter.org/wp-](https://www.palmcenter.org/wp-content/uploads/2018/04/Transgender-troops-are-medically-fit-pdf.pdf)

[content/uploads/2018/04/Transgender-troops-are-medically-fit-pdf.pdf](https://www.palmcenter.org/wp-content/uploads/2018/04/Transgender-troops-are-medically-fit-pdf.pdf).

9. Attached as **Exhibit 33** is a true and correct copy of the U.S. Army webpage for the Sergeant Audie Murphy Award, which notes that the award received by Plaintiff Sergeant First Class Schmid “is a privilege earned by a few exceptional noncommissioned officers” who “exemplify leadership characterized by personal concern for the needs, training, development and welfare of soldiers and concern for families of soldiers,” retrieved from:

<https://home.army.mil/greggadams/about/Garrison/sergeant-audie-murphy-award#qt0:0>.

10. Attached as **Exhibit 34** is a true and correct copy of a news article by Tara Copp with the title “All 4 service chiefs on record: No harm to units from transgender service,” dated April 24, 2018, retrieved from the Military Times website at:

<https://www.militarytimes.com/news/your-military/2018/04/24/all-4-service-chiefs-on-record-no-harm-to-unit-from-transgender-service/>.

11. Attached as **Exhibit 35** is a true and correct copy of the declaration of Martha Soper, former Assistant Deputy, Health Policy in the Office of the Deputy Assistant Secretary of the Air Force, Reserve Affairs & Airman Readiness from October 2014 to September 2020, dated March 3, 2025, and which was filed in the case *Talbott v. United States*, No. 1:25-cv-00240 (ACR), in the United States District Court for the District of Columbia as ECF No. 72-82 on March 7, 2025.

12. Attached as **Exhibit 36** is a true and correct copy of the Memorandum Opinion issued by the United States District Court for the District of Columbia in *Talbott v. United States*, No. 1:25-cv-00240 (ACR), on March 18, 2025 (ECF No. 89), granting the plaintiffs’ motion for a preliminary injunction.

EXECUTED this 19th day of March, 2025, at Seattle, Washington.

s/ Matthew P. Gordon  
Matthew P. Gordon